REMARKS

Claims 1-5, 21, 22 and 28-35 are pending. By this response, claims 1, 21, 32 and 34 are amended. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Interview

Applicants appreciate the courtesies extended to Applicants' representative during the interview conducted on January 23, 2006. During the interview, the Examiner stated that further definement of the temporal conversion elements as it relates to other components as illustrated in FIG. 1 would overcome the teachings of the cited references. Applicants note that independent claims 1, 21 and 32 have been amended in order to further define the temporal conversion elements and other components it relates to.

Prior Art Rejections

The Office Action rejects claims 21, 22 and 34 under 35 U.S.C. § 102(b) as being anticipated by Florentin (US 5,835,147) and claims 1-5, 28-33 and 35 under 35 U.S.C. § 103(a) as being unpatentable over Kobayashi et al. (US 6,46,625) in view of Florentin. These rejections are respectfully traversed.

Claim 1 now recites, *inter alia*, a picture conversion unit including a bandwidth filter; a pel count converter; a frame/field decimator unit that decimates redundant frames and fields; a scan converter that converts the image signal received from the frames/fields decimation unit to block scan data in a preprocess controller that controls the frame/field decimation unit, pel count converter and scan converter based on the coding difficulty information.

Claim 21 recites, *inter alia*, temporally converting a picture data format based on coding difficulty information using at least temporal conversion to reduce temporally redundant information by filtering the picture data through a bandwidth filter; processing the filter picture data through pel count converter; decimating redundant frames of the pel picture data through a

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frame/field decimation unit; converting the decimation picture data to block scan data by a scan converter; and controlling the frame/field decimation unit, pel count converter and scan converter based on the coding difficulty information by a preprocessor controller.

Claim 32 recites, *inter alia*, temporally converting a picture format of the source picture data to reduce temporally-redundant information by filtering the source picture data through a bandwidth filter; processing the filtered picture data through a pel count counter; decimating redundant frames and fields of the picture data through a frame/field decimation unit, converting the decimated picture data to block scan data by a scan converter; and controlling the frame/field decimation unit, pel count converter and scan converter based on a coding difficulty information determined from the source picture data by a preprocess controller.

Applicants respectfully submit that neither Florentin nor Kobayashi teach the above claimed features. Florentin teaches a method of transmitting a sequence of images. Prior to transmitting, a preprocessor prepares the signal by converting the signal from analog to digital, running the signal through a low pass filter and performing horizontal and vertical decimation. Florentin does not teach or suggest the use of a bandwidth filter, pel count converter, frame/field decimation and scan converter along with coding difficulty information as in the present invention.

Further, Kobayashi teaches a method of processing the picture signals in order to suppress block distortion as well as other noises in the encoding/decoding process. The processing apparatus includes a filter for filtering the picture, an encoder which encodes the picture, a decoder for decoding the picture, and a noise reducer unit which reduces the block distortion of a picture decoded by the decoding unit on a small block basis. Kobayashi however, fails to teach or suggest the use of a filter, pel count converter, frame/field decimation unit, scan converter in conjunction with a coding difficulty information all controlled by a preprocess controller as claimed in the present invention.

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Applicants respectfully submit that Florentin alone or in combination with Kobayashi fails to teach each and every feature of independent claims 1, 21 and 32. Dependent claims 2-5, 22, 28-31 and 33-35 are also distinguishable for the above reasons as well as for the additional features they recite. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.
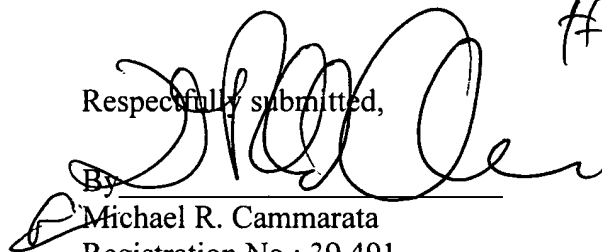
CONCLUSION

For at least these reasons, it is respectfully submitted that claims 1-5, 21, 22 and 28-35 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

If the Examiner has any questions concerning this application, the Examiner is requested to contact Chad J. Billings, Reg. No. 48,917 at the telephone number of (703) 205-8000.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17; particularly, extension of time fees.

Dated: Respectfully submitted,

                                            By:
                                            Michael R. Cammarata
                                            Registration No.: 39,491
                                            BIRCH, STEWART, KOLASCH & BIRCH, LLP
                                            8110 Gatehouse Road
                                            Suite 100 East
                                            P.O. Box 747
                                            Falls Church, Virginia 22040-0747
                                            (703) 205-8000
                                            Attorney for Applicant